

EXHIBIT 1

EXHIBIT 1

Dkt. / Ex. No.	Document
Dkt 124-6 Ex. 3	Informational material
Dkt 124-8 Ex. 5	Portions of the transcript from the deposition of Dori Buckethal
Dkt 124-10 Ex. 7	Attachment A (pp. 14-21) of Defendant Thomson Reuters Corporation's Responses and Objections to Plaintiffs' First Set of Interrogatories to Defendant
Dkt 125-2 Ex. 17	Informational material
Dkt 125-10 Ex. 27	Informational material
Dkt 125-11 Ex. 28	Informational material
Dkt 125-19 Ex. 36	Informational material
Dkt 127-11 Ex. 58	Informational material

EXHIBIT 2

EXHIBIT 2

Brief Cite	Portion(s) to Seal	Basis
Dkt 124-3 1:11	After “private investigators, even” and before “millions of dollars each year”	Reveals non-public information about the identity of a specific CLEAR customer, who is not party to this litigation, and about the total revenue earned through CLEAR. Public disclosure would harm Thomson Reuters and would unnecessarily disclose information about third-parties not subject to this litigation.
Dkt 124-3 4:18	After “arrested in” and before “for example”	Reveals non-public information about the frequency at which a specific category of information is updated and a source of information accessible through CLEAR. Public disclosure would harm Thomson Reuters and would unnecessarily disclose information about third-parties not subject to this litigation.
Dkt 124-3 4:23	After “It licenses it through” and before “third parties”	Reveals non-public information about Plaintiffs’ inaccurate and misleading estimation of the number of third-parties who license data for access through CLEAR. Public disclosure would harm Thomson Reuters.
Dkt 124-3 5:23-24; 5:25-27	FN 3: After “(“Jane” Powerpoint)” and before “Ex. 32” FN 3: After “(August 2015 Legal Powerpoint)” and before “Ex. 33” FN 3: after “(Email 6/15-7/5)” and before “Ex. 6”	Reveals non-public information about the names of internal databases and files and the total number of records in specific data sets related to CLEAR. Public disclosure would harm Thomson Reuters and would unnecessarily disclose information about third-parties not subject to this litigation.

Brief Cite	Portion(s) to Seal	Basis
Dkt 124-3 6:13	After “considered” and before “ <i>See Ex. 50</i> ”	Quotes isolated internal employee communications without context, such that the quote gives an incomplete and misleading picture of Thomson Reuters business practices related to CLEAR. Public disclosure would harm Thomson Reuters.
Dkt 124-3 6:14-15	After “analysts discussing that they” and before “Ex. 51”	Quotes isolated internal employee communications without context, such that the quote gives an incomplete and misleading picture of Thomson Reuters business practices related to CLEAR. Public disclosure would harm Thomson Reuters.
Dkt 124-3 6:16-17	After “(discussing” and before “Ex. 52”	Quotes isolated internal employee communications without context, such that the quote gives an incomplete and misleading picture of Thomson Reuters business practices related to CLEAR. Public disclosure would harm Thomson Reuters.
Dkt 124-3 6:20-21	After “to control their personal information” and before “ <i>See Ex. 54</i> ”	Quotes isolated internal employee communications without context, such that the quote gives an incomplete and misleading picture of Thomson Reuters business practices related to CLEAR. Public disclosure would harm Thomson Reuters.

Brief Cite	Portion(s) to Seal	Basis
Dkt 124-3 6:22-23	FN 4: After “ <i>See</i> Ex. 44 (Email 6/13-6/14)” and before “[.]”; Ex. 45”	Quotes isolated internal employee communications without context, such that the quote gives an incomplete and misleading picture of Thomson Reuters business practices related to CLEAR, and reveals confidential, non-public information regarding Thomson Reuters’s investigations into suspected misuse of CLEAR for purposes regulated under the Fair Credit Reporting Act (“FCRA”) and the processes that Thomson Reuters puts in place to prevent misuse and ensure security of CLEAR. Public disclosure would harm Thomson Reuters.
Dkt 124-3 6:24-25	FN 4: After “Ex. 45 (Email 7/17-2/13)” and before “Ex. 46 (Public Records Compliance Chart)”	Describes isolated internal employee communications without context, such that the description gives an incomplete and misleading picture of Thomson Reuters business practices related to CLEAR, and reveals confidential, non-public information regarding communication between Thomson Reuters and an individual consumer not related to this litigation. Public disclosure would harm Thomson Reuters.
Dkt 124-3 6:25-26	FN 4: After “Ex. 47 (Email 3/5-4/20)” and before “Ex. 48”	Describes isolated internal employee communications without context, such that the description gives an incomplete and misleading picture of Thomson Reuters business practices related to CLEAR. Public disclosure would harm Thomson Reuters.

Brief Cite	Portion(s) to Seal	Basis
Dkt 124-3 6:26-27	FN 4: After “Ex. 48 (Email 1/28-1/29)” and before “Ex. 49 (Email 11/21-12/9)”	Quotes isolated internal employee communications without context, such that the quote gives an incomplete and misleading picture of Thomson Reuters business practices related to CLEAR, and reveals confidential, non-public information regarding a request for assistance from a government agency and the name and contact information for the point of contact for the government agency and processes put in place to prevent misuse and ensure security of CLEAR. Public disclosure would harm Thomson Reuters and would unnecessarily disclose information about a government agency not subject to this litigation.
Dkt 124-3 6:28	FN 4: After “Ex. 49 (Email 11/21-12/9)” to end of sentence in FN 4.	Quotes isolated internal employee communications without context, such that the quote gives an incomplete and misleading picture of Thomson Reuters business practices related to CLEAR. Public disclosure would harm Thomson Reuters.
Dkt 124-3 7:1-2	Beginning of first line of page and before “Ex. 55”	Describes isolated internal employee communications without context, such that the quote gives an incomplete and misleading picture of Thomson Reuters business practices related to CLEAR, and reveals confidential, non-public information regarding restrictions placed by data licensors on specific clients’ access to certain records. Public disclosure would harm Thomson Reuters.

Brief Cite	Portion(s) to Seal	Basis
Dkt 124-3 7:3-6	After “Ex. 55 (Email 2/2-2/11)” and before “ <i>see also</i> Ex. 56”	Quotes isolated internal employee communications without context, such that the quote gives an incomplete and misleading picture of Thomson Reuters business practices related to CLEAR, and reveals confidential, non-public information regarding the source of specific categories of records accessible through CLEAR. Public disclosure would harm Thomson Reuters.
Dkt 124-3 7:7-10	After “Thomson Reuters found” and before “Ex. 57”	Describes isolated internal employee communications without context, such that the description gives an incomplete and misleading picture of Thomson Reuters business practices related to CLEAR, and reveals confidential, non-public information regarding the source of specific categories of records accessible through CLEAR. Public disclosure would harm Thomson Reuters.
Dkt 124-3 7:13	After “has made over” and before “million selling access”	Non-public information about the total revenue earned through CLEAR. Public disclosure would harm Thomson Reuters.
Dkt 124-3 7:17-18	After “seeing revenues grow from” and before “ <i>See</i> Ex. 60.”	Non-public information about the total revenue earned through CLEAR. Public disclosure would harm Thomson Reuters.

Brief Cite	Portion(s) to Seal	Basis
Dkt 124-3 7:19-20	After “list of clients that are” and before “corporate and government customers.”	Reveals non-public information about the CLEAR customer base, specifically, the proportion of government and corporate customers. Public disclosure would harm Thomson Reuters.
Dkt 124-3 7:25-26	After “customers for a central purpose:” and before “ <i>See Ex. 61.</i> ”	Quotes a single sentence from an internal training presentation without context, such that the quote gives an incomplete and misleading picture of Thomson Reuters business practices related to CLEAR. Public disclosure would harm Thomson Reuters.

EXHIBIT 3

EXHIBIT 3

Dkt. / Ex. No.	Portion(s) to Seal	Basis to Seal
Dkt 124-4 Ex. 1	Fox Dep. at 50:15-19 (after “believe it’s about” to the end of line 19)	Reveals non-public, confidential, competitively sensitive information regarding the quantity of CLEAR customers in specific categories. Public disclosure would harm Thomson Reuters.
Dkt 124-4 Ex. 1	Fox Dep. at 64:15-20 (after “type of data.” to the end of line 20); Fox Dep. at 80:1-2; Fox Dep. at 95:7-96:19; Fox Dep. at 106:11-106:12 (after “detail, please,” and before “correct?”); Fox Dep. at 106:17; Fox Dep. at 106:20; Fox Dep. at 116:17-18 (after “based on previous testimony,” and before “it enters into our systems,”); Fox Dep. at 156:13-157:4; Fox Dep. at 169:21-22; Fox Dep. at 170:2-4	Reveals confidential, non-public information about the technical processes and capabilities for ingesting, organizing, updating, and revising information accessible through CLEAR. Public disclosure would harm Thomson Reuters.
Dkt 124-4 Ex. 1	Fox Dep. at 105:14-15; Fox Dep. at 108:16-18 (after “where it says,” to the end of line 18); Fox Dep. at 108:20-21 (after “referencing the addition of” and before “to the CLEAR - - strike that.”); Fox Dep. at 108:23 (beginning of line and before “to CLEAR?”); Fox Dep. at 110:2-3 (beginning of line and before “new driver’s”); Fox Dep. at 110:8 (after “is” to end of line 8); Fox Dep. at 110:9-12 (after “And we don’t - - and” to end of line 12)	Reveals confidential, non-public information about the quality and quantity of records accessible through CLEAR. Public disclosure would harm Thomson Reuters.

Dkt. / Ex. No.	Portion(s) to Seal	Basis to Seal
Dkt 124-4 Ex. 1	Fox Dep. at 99:12-18; Fox Dep. at 121:15-122:4; Fox Dep. at 122:21-25; Fox Dep. at 123:5-12; Fox Dep. at 178:2-24	Reveals confidential, non-public information about Thomson Reuters' business dealings with the third-parties who license data to CLEAR, including non-public information about Thomson Reuters' agreements and internal discussions with its data licensor. Public disclosure would harm Thomson Reuters.
Dkt 124-7 Ex. 4	Turow Report page 12, line 4 (beginning of line and before "pages")	Reveals confidential, non-public information regarding the number of pages in an individual CLEAR report without context, such that the document gives an incomplete and misleading picture of the report. Public disclosure could harm Thomson Reuters.
Dkt 124-7 Ex. 4	Turow Report page 12, FN 30 (after "listing" and before "Fox Dep. 98:21-22") Turow Report page 12, FN 31 (after "listing" and before "Fox Dep. 98:21-22")	Reveals confidential, non-public, competitively sensitive information regarding the quantity of categories of data and data elements accessible through CLEAR. Public disclosure could harm Thomson Reuters.
Dkt 124-7 Ex. 4	Turow Report page 14, FN 40 (after "In fact, I understand that" and before "Fox Dep. 132:20-133:19") Turow Report page 14, FN 40 (after "Fox Dep. 132:20-133:19" to the end of FN 40)	Reveals confidential, non-public information regarding the technical processes and capabilities for ingesting, organizing, updating, and revising information accessible through CLEAR, including the technical process of "pinning" data. Public disclosure would harm Thomson Reuters.

Dkt. / Ex. No.	Portion(s) to Seal	Basis to Seal
Dkt 124-7 Ex. 4	Turow Report page 20, line 5 (after “add to CLEAR, including, potentially” to the end of sentence) Turow Report page 20, FN 59 (after “listing” and before “in a page of a presentation”) Turow Report page 20, FN 59 (after “exploring the addition of” and before “to its CLEAR profiles”)	Reveals confidential, non-public, competitively sensitive information regarding considered future features of the CLEAR product and describes considered future features without context, such that the document gives an incomplete and misleading picture of Thomson Reuters business practices related to CLEAR. Public disclosure would harm Thomson Reuters.
Dkt 124-7 Ex. 4	Turow Report page 21, FN 64 (entire footnote) Turow Report page 29, second row of table re beg bates TR-BROOKS040077 - in the document description column (after “personnel and client” and before “discussing CLEAR matching”)	Reveals the identities of CLEAR customers, which in most cases are not publicly-known. Public disclosure would harm Thomson Reuters and would unnecessarily disclose information about third-parties not subject to this litigation.
Dkt 124-7 Ex. 4	Turow Report page 26, first row of table - continuation from previous page re beg bates TR-BROOKS018865 - in the document description column (after “discussing” and before “(June 2015)”)	Reveals confidential, non-public information regarding an internal email discussion related to use of CLEAR. Public disclosure could harm Thomson Reuters.
Dkt 124-7 Ex. 4	Turow Report page 26, sixth row of table in the document description column (after “Annual Subscription Renewal” and before “& West Publishing Corporation”) Turow Report page 26, seventh row of table in the document description column (after “Weekly Data Updates,” and before “& West Publishing Corporation”) Turow Report page 26, eighth row of table in the document description column (after “West Group &” and before “(Sept. 21, 2000)”)	Reveals confidential, non-public information regarding the identities of third-parties that license data for inclusion in CLEAR. Public disclosure would harm Thomson Reuters and would unnecessarily disclose information about third-parties not subject to this litigation.

Dkt. / Ex. No.	Portion(s) to Seal	Basis to Seal
	Turow Report page 26, ninth row of table in the document description column (after “Contract” and before “(June 16, 1999)”) Turow Report page 26, tenth row of table in the document description column (after “Contractual Agreement Between” and before “& West Publishing Corporation”) Turow Report page 26, eleventh row of table in the document description column (after “Agreement” and before “West Services Inc. &”) Turow Report page 26, eleventh row of table in the document description column (after “West Services Inc. &” and before “(Feb. 8, 2013)”) Turow Report page 27, fifth row of table in the document description column (after “West Publishing &” and before “(Aug. 25, 2016)”) Turow Report page 27, sixth row of table in the document description column (after “West Services &” and before “(July 19, 2004)”) Turow Report page 27, seventh row of table in the document description column (after “West Services &” and before “(Aug. 29, 2006)”) Turow Report page 27, eighth row of table in the document description column (after “West Services &” and before “(June 1, 2007)”) Turow Report page 27, ninth row of table in the document description column (after “West Services &” and before “(Nov. 29, 2006)”) Turow Report page 27, tenth row of table in the document description column (after “Purchase Order,” to the end of description)	

Dkt. / Ex. No.	Portion(s) to Seal	Basis to Seal
	Turow Report page 27, eleventh row of table in the document description column (after “Supply Agreement,” and before “& West Services, Inc.”) Turow Report page 28, first row of table in the document description column (after “Supply Agreement,” and before “& West Services, Inc.”) Turow Report page 28, second row of table in the document description column (after “License Agreement,” and before “& West Services, Inc.”) Turow Report page 28, third row of table in the document description column (after “License Agreement,” and before “& West Services, Inc.”) Turow Report page 28, fourth row of table in the document description column (after “Second Addendum,” and before “& West Services, Inc.”) Turow Report page 28, fifth row of table in the document description column (after “Order Form for,” and before “West Services &”) Turow Report page 28, fifth row of table in the document description column (after “West Services &” and before “(Dec. 14, 2014)”)) Turow Report page 28, sixth row of table in the document description column (after “West Publishing &” and before “(Mar. 1, 2017)”)) Turow Report page 28, seventh row of table in the document description column (after “West Publishing &” and before “(May 25, 2019)”)) Turow Report page 28, eighth row of table in the document description column (after	

Dkt. / Ex. No.	Portion(s) to Seal	Basis to Seal
	“Reseller Agreement,” and before “& West Publishing Corporation”) Turow Report page 28, ninth row of table in the document description column (after “West Publishing &” and before “(Aug. 1, 2017)”)) Turow Report page 28, tenth row of table in the document description column (after “West Services &” and before “(Nov. 13, 2009)”)) Turow Report page 29, first row of table - continuation from previous page - in the document description column (after “West Services &” and before “(Feb. 2, 2010)”))	
Dkt 124-9 Ex. 6	Godlewski Dep. at 131:6-9	Reveals the identity of the third-party that licenses a specific category of information for access through CLEAR. Public disclosure would harm Thomson Reuters.
Dkt 127-12 Ex. 59	FSG Report page 1, line 16 (after “shows total net profits of approximately” and before “as of the end of 2021.”) FSG Report page 17, bottom of page (all information/data contained underneath table titled: 2021 - total of two columns and 9 rows) FSG Report page 18, middle of page (all information/data contained below the table column headers - total of 6 columns and 11 rows) FSG Report page 19, line 6 (after “can be calculated as approximately” to the end of sentence) FSG Report Exhibit 1 (entire document)	Reveals non-public, confidential information about Plaintiffs’ expert’s inaccurate and misleading estimation of revenues and net profits earned through CLEAR. Public disclosure would harm Thomson Reuters.

Dkt. / Ex. No.	Portion(s) to Seal	Basis to Seal
Dkt 127-12 Ex. 59	FSG Report page 5, FN 15 (after “TR-BROOKS082062 (listing” and before “Fox Dep. 98:7-8”)	Reveals confidential, non-public, competitively sensitive information regarding the quantity of categories of data and data elements accessible through CLEAR. Public disclosure would harm Thomson Reuters.
Dkt 127-12 Ex. 59	FSG Report page 6, line 4 (entire line except footnote)	Quotes a single sentence from an internal training presentation without context, such that the quote gives an incomplete and misleading picture of Thomson Reuters business practices related to CLEAR. Public disclosure could harm Thomson Reuters.
Dkt 127-12 Ex. 59	FSG Report page 6, (entire image of powerpoint slide in middle of page)	Compiles and reveals confidential, non-public information regarding the identities of the third-parties who license data for access through CLEAR; confidential revenue information; specific records that can be accessed through CLEAR; and competitively sensitive information which reveal Thomson Reuters’s market strategy. Public disclosure would harm Thomson Reuters and would unnecessarily disclose information about third-parties not subject to this litigation.
Dkt 127-12 Ex. 59	FSG Report page 10, (all data underneath the table column header titled: “Total Revenue (\$MMs)”)	Reveals non-public, confidential information about the total revenue earned through CLEAR. Public disclosure would harm Thomson Reuters.

Dkt. / Ex. No.	Portion(s) to Seal	Basis to Seal
Dkt 127-12 Ex. 59	FSG Report page 11, last two lines 26-27 (after “(e.g.,” and before “etc.).”) FSG Report Appendix A page 12, line 3 (after “Email from Alan Schafer Re:” and before TR-BROOKS04729-TR-BROOKS047039”) FSG Report Appendix A page 13, line 7 (after “Email from Britton Wolf re:” and before “TR-BROOKS176757-TR-BROOKS176764”)	Reveals the identities of CLEAR customers, which in most cases are not publicly-known. Public disclosure would harm Thomson Reuters and would unnecessarily disclose information about a third-party not subject to this litigation.
Dkt 127-12 Ex. 59	FSG Report page 12, FN 42 (after “over the years 2010-2017, from” and before “TR-BROOKS123263;”)	Reveals non-public, confidential, competitively sensitive information about the total revenue earned through CLEAR from different customer segments and changes over time. Public disclosure would harm Thomson Reuters.
Dkt 127-12 Ex. 59	FSG Report page 13, FN 47 (after “testifying that about” and before “of CLEAR’s current customers”)	Reveals non-public, confidential, competitively sensitive information regarding the quantity of CLEAR customers in specific categories. Public disclosure would harm Thomson Reuters.

Dkt. / Ex. No.	Portion(s) to Seal	Basis to Seal
Dkt 127-12 Ex. 59	FSG Report page 14, line 5 (after “the data indicates that approximately” and before “of all CLEAR searches”) FSG Report page 14, FN 49 - continuation from previous page (after “showing” and before “of CLEAR usage transactions”) FSG Report page 14, FN 49 - continuation from previous page (after “CLEAR Desktop and” and before “occurring through CLEAR S2S,”) FSG Report page 14, FN 49 - continuation from previous page (after “with the remaining” and before “attributable to Batch searches”)	Reveals non-public, confidential, competitively sensitive information regarding the quantity of various types of searches conducted in CLEAR. Public disclosure would harm Thomson Reuters.
Dkt 127-12 Ex. 59	FSG Report page 16, lines 23-26 (after “was entered into between Thomson Reuters and” and before “[fn59] As a second example,”) FSG Report page 16, line 27 (after “As a second example, an agreement between Thomson Reuters and” and before “to be made available through”) FSG Report pages 16 through 17, bottom line 29 through top of next page line 1 (after “California, with royalties of” through end of sentence at top of next page before “[fn60] Absent”)	Reveals confidential, non-public information regarding Thomson Reuters business dealings with third-parties who license data for access through CLEAR, including non-public information about Thomson Reuters’ data licensing agreement, the identities of certain data licensors, the categories of records provided by those data licensors, and financial agreements between Thomson Reuters and those data licensors. Public disclosure would harm Thomson Reuters and would unnecessarily disclose information about third-parties not subject to this litigation.
Dkt 127-12 Ex. 59	FSG Report page 17, line 10 (after “consistently at or below” and before “of the corresponding revenues.”) FSG Report page 17, line 11 (after “my calculations use the” and before “figure as a reasonable estimate”)	Reveals non-public, confidential information regarding Thomson Reuters royalty costs. Public disclosure would harm Thomson Reuters.

Dkt. / Ex. No.	Portion(s) to Seal	Basis to Seal
Dkt 127-13 Ex. 60	Page 3, lines 5-14 (all data underneath table column 2 titled: “Recurring Revenue Attributed to CLEAR” and all data underneath table column 3 titled: “Transactional Revenue Attributed to CLEAR”)	Reveals confidential, non-public information about the total recurring versus transactional revenue attributed to CLEAR on an annual basis. Public disclosure would harm Thomson Reuters.
Dkt 127-17 Ex. 70	All 75 pages of “Excel Sheet 2,” which follow directly after first two pages which comprise “Excel Sheet 1”	Reveals confidential, non-public information about the utilization rates of data subject requests over a specified period of time, including a detailed, nonpublic data subject request queue. (The first two pages, by contrast, contain public information.) Public disclosure would harm Thomson Reuters.

EXHIBIT 4

EXHIBIT 4

Dkt. / Ex. No.	Document	Basis to Seal
Dkt 124-5 Ex. 2	Internal training materials in the form of talking points for sales personnel to use with prospective CLEAR customers	Compiles and reveals confidential, non-public information about Thomson Reuters' training methods, market strategy, and talking points for prospective CLEAR customers. Public disclosure would harm Thomson Reuters.
Dkt 124-11 Dkt 124-12 Exs. 8 & 9	Internal spreadsheet of CLEAR customers	Compiles the identities of CLEAR customers, which in most cases are not publicly-known. Public disclosure would harm Thomson Reuters and would unnecessarily disclose information about third-parties not subject to this litigation.
Dkt 124-13 Ex. 12	Sample CLEAR report	Reveals detailed information about the layout, categories of content, and design of reports generated through CLEAR—information that is not available to the general public, including CLEAR competitors, and which is instead ordinarily only available to credentialed and authorized CLEAR subscribers. The document also gives an incomplete and misleading picture of the “typical” CLEAR report, because the sample CLEAR report is intended to provide an accounting of all of the categories information that might hypothetically be included in a given CLEAR report but, in reality, a given CLEAR report is unlikely to include <i>all</i> the information listed in the sample. Public disclosure could harm Thomson Reuters.

Dkt. / Ex. No.	Document	Basis to Seal
Dkt 124-14 Ex. 15	Internal email discussing needed clarifications as to what information is and is not accessible through CLEAR	Includes isolated internal employee communications without context, such that the document might give an incomplete and misleading picture of Thomson Reuters business practices related to CLEAR. Public disclosure would harm Thomson Reuters.
Dkt 125-1 Ex. 16	Internal employee training materials in the form of a test with questions and answers	Compiles and reveals confidential, non-public information about Thomson Reuters' training methods, market strategy, business dealings with the third-parties who license data for access through CLEAR, and processes put in place to prevent misuse and ensure security of CLEAR. Public disclosure would harm Thomson Reuters and would unnecessarily disclose information about third-parties not subject to this litigation.
Dkt 125-3 Ex. 19	Email conversation among employees in response to a request for information for marketing materials	Reveals confidential, non-public information about the quality and quantity of specific categories of records accessible through CLEAR and Thomson Reuters' business dealings with third-parties. Public disclosure would harm Thomson Reuters.
Dkt 125-4 Ex. 20	Email conversation among employees regarding enhancements made to CLEAR in March of 2021 and regarding an incoming request for proposal	Reveals confidential, non-public information about the quality and quantity of records accessible through CLEAR and the nature and timing of specific product releases and steps taken to improve the CLEAR product and improve the user experience. Public disclosure would harm Thomson Reuters.

Dkt. / Ex. No.	Document	Basis to Seal
Dkt 125-5 Ex. 21	Internal spreadsheet of CLEAR data sources	Compiles information about the quality and quantity of records accessible through CLEAR, including the frequency of update for records from various sources. Public disclosure would harm Thomson Reuters.
Dkt 125-6 Ex. 23	Internal powerpoint presentation providing a detailed review of CLEAR data licensors	Compiles and reveals confidential, non-public information about the quality and quantity of records accessible through CLEAR, as well as Thomson Reuters' business dealings with the third-parties who license data for inclusion accessible through CLEAR, including Thomson Reuters' strategic business assessments of value of various licenses. Public disclosure would harm Thomson Reuters.
Dkt 125-7 Ex. 24	Internal spreadsheet of upcoming notice due dates for data licensors	Compiles and reveals confidential, non-public information about Thomson Reuters' business dealings with the third-parties who license data for access through CLEAR and/or other products unrelated to CLEAR, including non-public information about the content of the data licensing agreements. Public disclosure would harm Thomson Reuters.
Dkt 125-8 Ex. 25	Product ladder of limited distribution that details the features and content available through various CLEAR plans	Compiles information and compares the content and features available through various CLEAR plans and plan enhancements through a product ladder of limited distribution which is not available to the general public—including CLEAR competitors. Public disclosure would harm Thomson Reuters.

Dkt. / Ex. No.	Document	Basis to Seal
Dkt 125-9 Ex. 26	Internal spreadsheet of CLEAR search metrics	Compiles and reveals confidential, non-public information about the utilization rates of various fields used by customers to search in CLEAR, as well as the quantity of searches conducted in CLEAR in a specific period of time. Public disclosure would harm Thomson Reuters.
Dkt 125-12 Ex. 29	Internal announcement about CLEAR product changes	Compiles and reveals confidential, non-public information regarding historical changes to CLEAR batch, including details on functionality and application logic. Public disclosure would harm Thomson Reuters.
Dkt 125-13 Ex. 30	Email conversation among employees regarding CLEAR search metrics	Compiles and reveals confidential, non-public information regarding the utilization rates of various fields used by customers to search in CLEAR and the quantity of searches conducted in CLEAR in a specific period of time, as well as internal considerations to improve CLEAR and the user experience. Public disclosure would harm Thomson Reuters.
Dkt 125-14 Ex. 31	Internal training powerpoint presentation providing technical processes and capabilities of CLEAR	Compiles and reveals confidential, non-public information regarding the technical processes and capabilities for ingesting, organizing, updating, and revising information accessible through CLEAR; as well as which specific records can be accessed through specific Thomson Reuters product offerings and the layout, categories of content, and design of reports generated through CLEAR. Public disclosure would harm Thomson Reuters.

Dkt. / Ex. No.	Document	Basis to Seal
Dkt 125-15 Ex. 32	Internal powerpoint presentation providing information on data licensing agreements	Compiles and reveals confidential, non-public information regarding Thomson Reuters' business dealings with the third-parties who license data for access through CLEAR, including the quantity of records provided by certain data licensors, non-public information about Thomson Reuters' data licensing agreements, the identities of data licensors, and the identities of individuals not subject to this litigation (e.g., former account managers). Public disclosure would harm Thomson Reuters and would unnecessarily disclose information about third-parties not subject to this litigation.
Dkt 125-16 Ex. 33	Email conversation among employees regarding CLEAR billing usage and validation	Compiles the identities of third-party licensors of records accessible through CLEAR, as well as the specific categories of records provided by certain third-party licensors, and reveals confidential, non-public information regarding the procedures, technical processes, and rates for billing CLEAR usage to customers. Public disclosure would harm Thomson Reuters.
Dkt 125-17 Ex. 34	Internal powerpoint presentation proposing data license agreement renewal for a specific data licensor	Reveals confidential, non-public information regarding Thomson Reuters' business dealings with a third-party who licenses data for access through CLEAR, including non-public information about a historical Thomson Reuters' agreement, confidential financial information, and internal strategies regarding agreement negotiations. Public disclosure would harm Thomson Reuters.

Dkt. / Ex. No.	Document	Basis to Seal
Dkt 125-18 Ex. 35	Internal training materials in the form of talking points for sales personnel to use with prospective CLEAR customers	Compiles and reveals confidential, non-public information about Thomson Reuters' training methods, market strategy, and talking points for prospective CLEAR customers. Public disclosure would harm Thomson Reuters.
Dkt 125-20 Ex. 37	Draft internal training materials in the form of talking points for sales personnel to use with prospective CLEAR customers	Compiles and reveals confidential, non-public information about Thomson Reuters' training methods, market strategy, and talking points for prospective CLEAR customers about the sources and nature of information accessible through CLEAR, and contains internal talking points to compare CLEAR with competitor research platform products. Public disclosure would harm Thomson Reuters.
Dkt 126-1 Ex. 38	Email conversations between Thomson Reuters and a CLEAR customer, and an internal conversation among employees, regarding the technical processes for pinning data to subjects in CLEAR	Reveals confidential, non-public information regarding the technical processes and capabilities for ingesting, organizing, updating, and revising information accessible through CLEAR; communications about the technical process of "pinning" data, as well as the name and contact information of a third-party not subject to this litigation. Public disclosure would harm Thomson Reuters and would unnecessarily disclose information about a third party not subject to this litigation.

Dkt. / Ex. No.	Document	Basis to Seal
Dkt 126-2 Ex. 39	Draft, internal document describing Thomson Reuters' public records products	Compiles and reveals confidential, non-public, and outdated (<i>see, e.g.</i>, the document's reference to MySpace) information about Thomson Reuters' market strategy and talking points for prospective CLEAR customers. Public disclosure would harm Thomson Reuters.
Dkt 126-3 Ex. 41	Internal powerpoint presentation regarding business operations	Reveals confidential, non-public information regarding the processes that Thomson Reuters puts in place to prevent misuse and ensure security of CLEAR, which would be less effective in preventing misuse if not kept secret, as well as confidential information regarding specific business strategies. Public disclosure would harm Thomson Reuters.
Dkt 126-4 Ex. 42	Internal powerpoint presentation regarding business operations	Compiles and reveals confidential, non-public information regarding the identities of CLEAR customers; the processes that Thomson Reuters puts in place to prevent misuse and ensure security of CLEAR, which would be less effective in preventing misuse if not kept secret; and confidential information regarding Thomson Reuters' business strategy. Public disclosure would harm Thomson Reuters.

Dkt. / Ex. No.	Document	Basis to Seal
Dkt 126-5 Ex. 43	Internal chart mapping the CLEAR credentialing process	Compiles and reveals confidential, non-public information regarding the technical and other processes that Thomson Reuters puts in place to prevent misuse and ensure security of CLEAR, and the operational process for customer intake and credentialing. Public disclosure would harm Thomson Reuters.
Dkt 126-6 Ex. 44	Email conversations regarding permissible use of CLEAR	Reveals confidential, non-public information regarding communications with a CLEAR customer, including the names and contact information of third-parties not subject to this litigation; the processes that Thomson Reuters puts in place to prevent misuse and ensure security of CLEAR, which would be less effective in preventing misuse if not kept secret; and private matters of Thomson Reuters employees not relevant to this litigation (e.g., vacation plans). Public disclosure would harm Thomson Reuters and would unnecessarily disclose information about third-parties not subject to this litigation.

Dkt. / Ex. No.	Document	Basis to Seal
Dkt 126-7 Ex. 45	Email conversations regarding permissible uses of CLEAR	Reveals confidential, non-public information regarding communication between Thomson Reuters and an individual consumer not related to this litigation; communications with a CLEAR customer, including the identity of a CLEAR customer and the name and contact information of a third-party not subject to this litigation; and the processes that Thomson Reuters puts in place to prevent misuse and ensure security of CLEAR, which would be less effective in preventing misuse if not kept secret. Public disclosure would harm Thomson Reuters and would unnecessarily disclose information about third-parties not subject to this litigation.
Dkt 126-8 Ex. 46	Internal FAQ document addressing compliance investigation questions	Compiles and reveals confidential, non-public information regarding the processes that Thomson Reuters puts in place to prevent misuse and ensure security of CLEAR, which would be less effective in preventing misuse if not kept secret. Public disclosure would harm Thomson Reuters.

Dkt. / Ex. No.	Document	Basis to Seal
Dkt 126-9 Ex. 47	Email conversations in response to customer inquiries	Reveals confidential, non-public information regarding the identity of a CLEAR customer; Thomson Reuters' business dealings with a CLEAR customer, including internal discussions related to the customer's inquiries; as well as the processes that Thomson Reuters puts in place to prevent misuse and ensure security of CLEAR, which would be less effective in preventing misuse if not kept secret. Public disclosure would harm Thomson Reuters and would unnecessarily disclose information about third-parties not subject to this litigation.
Dkt 127-1 Ex. 48	Email conversation among employees regarding a customer request	Reveals confidential, non-public information regarding a request for assistance from a government agency and the name and contact information for the point of contact for the government agency; and processes put in place to prevent misuse and ensure security of CLEAR, which would be less effective in preventing misuse if not kept secret. Public disclosure would harm Thomson Reuters and would unnecessarily disclose information about a government agency not subject to this litigation.

Dkt. / Ex. No.	Document	Basis to Seal
Dkt 127-2 Ex. 49	Email conversation among employees regarding data security features of CLEAR	Reveals confidential, non-public information regarding communications with current or historic CLEAR customers; the identity of a CLEAR customer; and the name and contact information of a third-party not subject to this litigation; and the processes that Thomson Reuters puts in place to prevent misuse and ensure security of CLEAR, which would be less effective in preventing misuse if not kept secret; and includes isolated internal employee communications without context, such that the document might give an incomplete and misleading picture of Thomson Reuters business practices related to CLEAR. Public disclosure would harm Thomson Reuters and would unnecessarily disclose information about third-parties not subject to this litigation.
Dkt 127-3 Ex. 50	Email conversation among employees regarding CLEAR credentialing	Reveals confidential, non-public information regarding the identity of a CLEAR customer, as well as Thomson Reuters' business dealings with a CLEAR customer, including internal discussions related to the customer's inquiries; and includes isolated internal employee communications without context, such that the document gives an incomplete and misleading picture of Thomson Reuters business practices related to CLEAR. Public disclosure would harm Thomson Reuters.

Dkt. / Ex. No.	Document	Basis to Seal
Dkt 127-4 Ex. 51	Email conversation among employees regarding CLEAR credentialing	Reveals confidential, non-public information regarding Thomson Reuters' agreements with its data licensors, the processes that Thomson Reuters puts in place to prevent misuse and ensure security of CLEAR, and Thomson Reuters' business dealings with a potential CLEAR customer, including the identity of a potential CLEAR customer and internal discussions related to the specific customer's inquiries; and includes isolated internal employee communications without context, such that the document gives an incomplete and misleading picture of Thomson Reuters business practices related to CLEAR. Public disclosure could harm Thomson Reuters.
Dkt 127-5 Ex. 52	Email conversation among employees regarding CLEAR credentialing	Reveals confidential, non-public information regarding Thomson Reuters' business dealings with a CLEAR customer, including the identity of a CLEAR customer, as well as the processes that Thomson Reuters puts in place to prevent misuse and ensure security of CLEAR, which would be less effective in preventing misuse if not kept secret. Public disclosure would harm Thomson Reuters.

Dkt. / Ex. No.	Document	Basis to Seal
Dkt 127-6 Ex. 53	Email conversation between Thomson Reuters and a customer regarding CLEAR credentialing	Reveals confidential, non-public information regarding Thomson Reuters' business dealings and communications with a CLEAR customer, the identity of a CLEAR customer and the name and contact information of a third-party not subject to this litigation, and the processes that Thomson Reuters puts in place to prevent misuse and ensure security of CLEAR, which would be less effective in preventing misuse if not kept secret. Public disclosure would harm Thomson Reuters and would unnecessarily disclose information about third-parties not subject to this litigation.
Dkt 127-7 Ex. 54	Internal email regarding certain information available through CLEAR	Reveals confidential, non-public information regarding Thomson Reuters' business dealings with the third-parties who license data for access through CLEAR, including non-public information about Thomson Reuters' data licensing agreements and internal discussions regarding those agreements; restrictions placed by data licensors on specific clients' access to certain records; the identities of CLEAR customers; and Thomson Reuters' business dealings with CLEAR customers. Public disclosure would harm Thomson Reuters.

Dkt. / Ex. No.	Document	Basis to Seal
Dkt 127-8 Ex. 55	Email from the sales team to a potential client	Reveals confidential, non-public information regarding Thomson Reuters' business dealings with a CLEAR customer, including the identity of the CLEAR customer and responses to the customer's inquiries, as well as the names and contact information of a third-party not subject to this litigation. Public disclosure would harm Thomson Reuters and would unnecessarily disclose information about third-parties not subject to this litigation.
Dkt 127-9 Ex. 56	Email conversation regarding certain information available through CLEAR	Reveals confidential, non-public information regarding Thomson Reuters' business dealings and communications with a CLEAR customer, including the identity of the CLEAR customer, as well as the names and contact information of a third-party not subject to this litigation. Compiles information regarding the quality and quantity of records accessible through CLEAR, including changes to information available from certain data sources. Public disclosure would harm Thomson Reuters and would unnecessarily disclose information about third-parties not subject to this litigation.

Dkt. / Ex. No.	Document	Basis to Seal
Dkt 127-10 Ex. 57	Internal email regarding certain information available through CLEAR	Reveals confidential, non-public information regarding steps taken to better position CLEAR in the marketplace and the rationale behind those steps, including strategies to communicate changes to information available through CLEAR; Thomson Reuters' business dealings with a third-party who licenses data for access through CLEAR; and includes isolated internal employee communications without context, such that the document gives an incomplete and misleading picture of Thomson Reuters business practices related to CLEAR. Public disclosure would harm Thomson Reuters.
Dkt 127-14 Ex. 61	Internal powerpoint presentation regarding CLEAR financial growth strategy	Compiles and reveals confidential, non-public information regarding the identities CLEAR customers and of the third-parties who license data for access through CLEAR; financial information and financial growth strategies; specific records that can be accessed through specific Thomson Reuters product offerings; steps taken to improve the CLEAR product and better position it in the marketplace, including the rationale behind those steps; and training materials which reveal Thomson Reuters's market strategy and non-public training methods; and includes isolated internal employee communications without context, such that the document might give an incomplete and misleading picture of Thomson Reuters business practices related to CLEAR. Public disclosure would harm Thomson Reuters and would unnecessarily disclose information about third-parties not subject to this litigation.

Dkt. / Ex. No.	Document	Basis to Seal
Dkt 127-15 Ex. 62	Internal training materials in the form of a powerpoint slide describing the Risk Inform product	Compiles and reveals confidential, non-public information about Thomson Reuters' training methods, market strategy, and talking points for prospective CLEAR customers and about specific CLEAR features. Public disclosure would harm Thomson Reuters
Dkt 127-16 Ex. 67	Email conversation regarding a consumer rights request under the CCPA	Reveals confidential, non-public information regarding communication from an individual consumer and internal processes related to compliance with the California Consumer Privacy Act; and includes isolated communications without context, such that the document might give an incomplete and misleading picture of Thomson Reuters business practices related to CLEAR. Public disclosure would unnecessarily disclose the non-public communications of a third party not subject to this litigation.
Dkt 127-18 Ex. 71	Internal spreadsheet of Real-Time Incarceration records coverage per state	Compiles and reveals confidential, non-public information regarding the quality and quantity of records accessible through CLEAR, including the estimated coverage of the national population by state. Public disclosure would harm Thomson Reuters.
Dkt 127-19 Ex. 72	Internal spreadsheet of Real-Time Incarceration records coverage per county	Compiles and reveals confidential, non-public information regarding the quality and quantity of records accessible through CLEAR, including the estimated coverage of the national population by county. Public disclosure would harm Thomson Reuters.

Dkt. / Ex. No.	Document	Basis to Seal
Dkt 128-1 Ex. 73	Individual CLEAR report for Plaintiff Cat Brooks	Reveals confidential, non-public information regarding the layout, categories of content, and design of reports generated through CLEAR, the names and contact information third-parties not subject to this litigation, information about named Plaintiff Cat Brooks, and includes over 2,900 pages of content from public, third-party websites which might relate to named Plaintiff Cat Brooks and/or third-parties not subject to this litigation. Public disclosure would harm Thomson Reuters and would unnecessarily disclose information about named Plaintiff Cat Brooks and about third-parties not subject to this litigation.
Dkt 129-1 Ex. 74	Individual CLEAR report for Plaintiff Rasheed Shabazz	Reveals confidential, non-public information regarding the layout, categories of content, and design of reports generated through CLEAR, the names and contact information of third-parties not subject to this litigation, information about named Plaintiff Rasheed Shabazz, and includes over 300 pages of content from third-party websites which might relate to named Plaintiff Rasheed Shabazz and/or third-parties not subject to this litigation. Public disclosure would harm Thomson Reuters and would unnecessarily disclose information about named Plaintiff Rasheed Shabazz and about third-parties not subject to this litigation.